



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 4/18/01
Time Start 1330
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name Col-Fin Speciality Steel I.D. Number PAD 0006737031Site Address Front St.County Beaver Municipality Fallston Zip 15066Name of Inspector Frank CalderonName & Title of Responsible Official Dave Pasquale President/ownerPerson Interviewed Steve Brown Plant Eng. Telephone (724) 843-7315Mailing Address (if different from above) P.O. Box 562 Fallston, Pa 15066Amount of Hazardous Waste Generated per Month: > 2,200 Pounds _____ Kgs

1. Site Characterization:

Follow up InspectionSTORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☒ Neutralization/WWTP ☒ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
	<u>Follow up inspection</u>	

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Col-Fin Specialty Steel ID Number PAD 000 737631 Date 7/19/01

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
		X		Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
		X		Identification Number	262a.10	262.12	H002
		X		Authorized transporters only	262a.10	262.12(c)	H003
		X		Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
	X			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
		X		Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
		X		Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
		X		Specified records retained for three years	262a.10	262.40(c)	H014
		X		Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
		X		Exception reporting procedures followed	262a.42	262.42	H016
		X		Spill reporting procedures followed	262a.10	262.34(d)	H017
		X		PPC plan developed and implemented	262a.10	262.34(a)	H018
	X			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
		X		Source reduction strategy prepared and available (LQG only)	262a.100		H020
		X		Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Col-Fin Specialty Steel ID Number PAD 486737431 Date 4/18/01

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
		X		Containers of hazardous waste in good condition	265a.1	265.171	H026
		X		Containers and stored waste compatible	265a.1	265.172	H027
		X		Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
		X		Containers managed to prevent leaks	265a.1	265.173(b)	H029
		X		Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
		X		Container storage areas inspected at least weekly	265a.1	265.174	H031
		X		Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
		X		Proper containment and collection systems in place	265a.179		H033
		X		Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

DATE OF INSPECTION: 4/18/01 IDENTIFICATION NUMBER: PAD000737031
SITE/CO NAME: Col-Fin Specialty Steel

This inspection is being conducted to review the abatement of violations noted during an inspection at this facility conducted on 4/10/01.

All the violations were associated with the drum storage of hazardous wastes. There were 12 drums in the storage area, 9 of which were not being managed properly. Three drums exceeded 90-day storage, and the remaining six lacked either the words "hazardous waste" or accurate descriptions of drum contents and all lacked accumulation dates.

All violations noted during the 4/10/01 inspection are considered abated, as all the drums in the hazardous waste storage area were shipped offsite for treatment/disposal. A copy of the manifest is attached. In addition, the inspection checklist and procedure have been revised to preclude container management problems in the future.

Note: Only those areas that were in non-compliance on the 4/10/01 inspection were reviewed, thus all other items are marked "not determined".

FJC

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of an violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed:  Date: 4/18/01

Inspector Signature:  Date: 4/18/01



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 4/10/01
Time Start 0900
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT
☒ **GENERATOR** ☐ **S Q GENERATOR**

Company name Col-Fin Specialty Steel I.D. Number PAD0088 737031
Site Address Front St.
County Beaver Municipality Fallston Zip 15066
Name of Inspector Frank Calderon
Name & Title of Responsible Official Dave Pasquale President/owner
Person Interviewed Steve Brown Plant Eng. Telephone (724) 843-7315
Mailing Address (if different from above) P.O. Box 562 Fallston, PA 15066
Amount of Hazardous Waste Generated per Month: 22,200 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☒ Neutralization/WWTP ☒ Reclaim Other _____
GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Envirite License Number PA AH 0548
Transporter Name PennOhio Corp License Number PA AH 0618
Transporter Name Chen Freight License Number PA AH 0674

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D002/D007	spent caustic permanganate	Envirite of OH
D002/D001	potassium permanganate (tub/tank bottoms)	Chemtron
D006	wheelabrator dust	" "
K062, D002	H ₂ SO ₄ sludge	MI Disposal Waste Treatment Plant
D002	lime waste	Envirite of OH
K062, D002	spent sulfuric acid	" "

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Col-Fin Specialty Steel ID Number PA0806737031 Date 4/10/01

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
		X		Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
	X			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
	X			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Col-Fin Specialty Steel ID Number PAID 0000 737 031 Date 4/10/01
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
			X	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
			X	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
			X	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
			X	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

4/10/01



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Hazardous Waste Inspection Report Hazardous Waste Permit by Rule Facility

Company name Col-Fin Specialty SteelI.D. Number PAD 0000 737 031

Determination of Applicability Required? 270a.60	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input type="checkbox"/>
Documentation Available?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input type="checkbox"/>
Does facility accept wastes from off-site for treatment in the PBR system?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N.D.	<input type="checkbox"/>
Does facility have an NPDES permit?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input type="checkbox"/>
If yes, NPDES Permit Number _____						
If no, does facility discharge to a sewage treatment system with an NPDES permit? If yes, NPDES Permit Number _____	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input type="checkbox"/>
If yes, does system meet all Federal, State and local pretreatment standards?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input type="checkbox"/>

If system does not directly discharge to a POTW or its own NPDES permitted discharge, explain here.

Site Name Col-Fin Specialty Steel ID Number PAD 0000 737 031 Date 4/10/01

Hazardous Waste Inspection Report Hazardous Waste Permit by Rule Facility (WWTP)

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NUMBER
				Facility has applied for or received an EPA Hazardous Waste Identification Number	264a.1	264.11	H550
X				Active portion has 24 hour surveillance	264a.1	264.14(b)(1)	H551
X				Artificial barrier surrounds active portion	264a.1	264.14(b)(2)	H552
X				Proper signs are posted	264a.1	264.14(c)	H553
X				Inspections are conducted as per inspection plan	264a.1	264.14(b)(1)	H554
X				Inspection schedule is retained at facility	264a.1	264.15(b)(2)	H555
X				Deterioration and/or malfunctions of equipment corrected as revealed by inspections	264a.1	264.15 (d)	H556
X				Immediate remedial action taken when a hazard is imminent or already present	264a.1	264.15(c)	H557
X				Inspection log is maintained and utilized properly	264a.1	264.15 (d)	H558
X				Personnel training plan approved by DEP and implemented	264a.1	264.16 (a)	H559

Cal-Fin Specialty Steel
 PAD 888 737 831
 4/10/01

Hazardous Waste Inspection Report

Hazardous Waste Permit by Rule Facility (WWTP)

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NUMBER
X				Facility has NPDES permit if required	264a.1	264.16(d)(e)	H560
X				Facility is equipped with internal alarm system capable of providing immediate emergency instruction to personnel	264a.1	264.32(a)	H561
X				Facility is capable of summoning outside emergency assistance	264a.1	264.32(b)	H562
X				Facility is equipped with fire, spill and decontamination control equipment	264a.1	264.32(c)	H563
X				Facility communication and/or alarm systems, and spill and decontamination control equipment is periodically tested and maintained	264a.1	264.33	H564
X				Adequate aisle space is maintained to allow unrestricted access for personnel and emergency equipment	264a.1	264.35	H565
X				Current PPC plan, prepared and implemented in accordance with Department's guidelines. Copy available on site.	264a.1	264.51	H566
X				Designated primary emergency coordinator and is on-site or on call at all times	264a.1	264.55	H567

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation 40 CFR Part 268
2	3	4				
				Generators		
Y				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
X				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
X				Dilution not used as a substitute for treatment.		3
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
	X			Storage Facilities		
				Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
				Containers marked to identify contents and accumulation date.		50(a)(2)
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
	X			Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
Y				Treatment Facilities, including PBR and RRR Facilities		
X				Dilution not used as a substitute for treatment.		3
X				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
	X			Land Disposal Facilities		
				Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
				Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
X				Facility retains copies of generator notifications and certifications.		7(c)(1)

EFFECTIVE DATE: AUG. 11, 1997

One LDR required for each waste stream generated after effective date. The LDR will contain the following information:

1. EPA hazardous waste and manifest number.
2. Statement that waste is not prohibited from land disposal.
3. Statement that waste is subject to LDR, the constituents of concern are _____ etc, and the underlying hazardous constituents are addressed.
4. Wastewater/nonwastewater category.
5. Waste analysis where available.
6. Date the waste is/was subject to prohibition.
7. If hazardous debris, are alternate trt. stds technologies used?
8. Generator managing lab packs containing hazardous waste.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

DATE OF INSPECTION: 4/10/01 IDENTIFICATION NUMBER: PAD000737031
SITE/CO NAME: Col-Fin Specialty Steel

This facility cold draws stock bar and wire for use primarily in the tool making industry. Stock is pickled in sulfuric acid, rinsed, and annealed. It is then pickled again, rinsed, and cleaned in caustic permanganate. The steel is then coated with zinc phosphate, stearate soap, or lime (or any combination there of) to aid in drawing. After the steel is cold-drawn, it may be annealed and/or pickled again, depending on its end use. Grinding may also be performed on the steel.

Pickling line chemicals are pumped directly from the process tubs into tanker trucks when spent. Pickle line clean-up wastes are stored in drums. Wheelabrator dust (Cd – D006) is also stored in drums. All hazardous waste drums are stored outside on a concrete pad. The concrete pad drains back to the wastewater treatment plant (WWTP).

Hydrochloric acid is only disposed when sludge in the pickling tub interferes with the pickling operation, which occurs every 3-4 years.

An acid recovery tower is used to reclaim sulfuric acid utilized on the pickling line. Chilling and agitation are used to precipitate ferrous sulfate crystals out of the acid, which is heated and returned to the pickling line via piping. Crystals are rinsed with water, which is then vacuumed off and added to the reclaimed acid prior to heating. The crystals are sold. As a result of installing new, polypropylene pickling tubs and adding a steam sparge to one tub, only the other tub, which has a heat exchanger, requires processing in the recovery tower. The bottom tank in the acid recovery unit is currently being replaced.

The facility operates a WWTP for the neutralization and treatment of rinse water from the pickling line. All permit by rule requirements for this operation are being met.

VIOLATIONS NOTED:

Reference line no. H008: Three drums of hazardous waste phoscoat sludge were stored/accumulated onsite for a period of time which exceeded 90 days, contrary to 40 CFR Part 262.34(a) as incorporated by reference at 25 Pa Code Chapter 262a.10. To abate this violation, you should arrange for the transportation of the aforementioned wastes to a permitted TSD.

Continued – next page

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of an violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed: _____ Date: _____

Inspector Signature: _____ Date: _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

DATE OF INSPECTION: 4/10/01 IDENTIFICATION NUMBER: PAD000737031
SITE/CO NAME: Col-Fin Specialty Steel

Reference line no. H025: Failure to manage containers of hazardous wastes per 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I corresponds to the following violations and will be abated when the following violations are corrected.

Reference line no. H035: Failure to clearly mark six drums of hazardous waste with the accumulation date and/or make visible for inspection contrary to 40 CFR Part 262.34(a)(2) as incorporated by reference at 25 PA Code Chapter 262a.10. To abate this violation, you should place the accumulation dates on all drums missing this information.

Reference line no. H036: Failure to label three drums of hazardous waste (2 – wheelabrator dust, 1 – phoscoat sludge) with the words “Hazardous Waste” contrary to 40 CFR Part 262.34(a) as incorporated by reference at 25 PA Code Chapter 262a.10. To abate this violation, you should label the aforementioned drums so as to mark them with the words “Hazardous Waste”.

Reference line no. H037: Failure to accurately label six drums of hazardous waste so as to accurately identify the contents, contrary to the Solid Waste Management Act, Sect. 6018.403(b)(2). To abate this violation you should label said drums so as to accurately identify the contents.

An inspection of this facility will be conducted on or about 18 April 2001 to determine if the aforementioned violations have been corrected.

FJC

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of an violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed: Stephen J. Braun Date: 4/10/01

Inspector Signature: Tom Col Date: 4/10/01

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Date of Inspection 10/7/97 Time start _____ Time finish _____
Name of Inspector Frank Calderon
Company, installation name Col-Fin Specialty Steel
Location Front St.
County Beaver Municipality Fallston
Identification number PAD 000737031
Name of responsible official Dave Pasquale
Title President/owner
Mailing Address _____
Area code and telephone number _____
Name of person interviewed Steve Brown
Title Plant Eng.
Mailing address (if different from above) P.O. Box 562 Fallston Pa 15066
Area code and telephone number 412-843-7315

1. Current waste handling method:

- a. ☒ On-site ☐ treatment, ☐ storage, ☐ disposal ☒ PBR
b. ☒ On-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim
c. ☒ Off-site ☒ treatment, ☐ storage, ☒ disposal
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 12,112 gal & 3,900 lbs. for pl. 1/47 - 9/47.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D002 / waste #2004	Enviro - 0HD938568892	Canton, OH Treatment/disposal
D003 / D006 / D002 - waste	Chemtron - 0HD866860689	Aur, OH
D002 / K002	City Environmental	Detroit, MI

4. Source Reduction: ☐ accomplished, ☒ proposed, ☐ not proposed

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Cal-Fin Specialty Steel ID Number PA D006737831 Date 10/7/97

Hazardous Waste Inspection Report Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
	X			Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
				PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
			X	Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
		X		Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
		X		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
		X		Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
		X		Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
		X		Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
		X		a). All containers of haz. waste in good condition	265.171	H016
		X		b). Containers compatible with hazardous waste being stored within	265.172	H017
		X		c). Containers of hazardous waste kept closed	265.173(a)	H018
		X		d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
		X		e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
X				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
		X		g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
X				h). Proper containment and collection system(s)	265.178	H023
		X		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

0

0

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
	X			Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
	X			Hazardous waste disposal plan, if required	262.45	H029
X				Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	X			Special requirements followed for international shipments	262.50..53, .55, .60	H032
X				Source reduction strategy prepared and available	262.80	H033

Cofin Specialty Steel
 PAB 737 031
 10/7/17

**Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist**

Colfin Specialty Steel
PAG 000737031
10/7/97

1-No Violation Observed

2-Not Applicable

3-Not Determined

4-Non-Compliance

Status					REQUIREMENT	Citation 40 CFR Part 268
1	2	3	4			
X					Generators	
X					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)
X					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)
X					Dilution not used as a substitute for treatment.	3
X					Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)
					Storage Facilities	
X	X	X	X	X	Facility verifies generators classification of waste in accordance with waste analysis plan.	25 Pa Code 265.13(c)
X	X	X	X	X	Containers marked to identify contents and accumulation date.	50(a)(2)
X	X	X	X	X	Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)
X	X	X	X	X	Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)
X	X	X	X	X	Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)
					Treatment Facilities, including PBR and RRR Facilities	
X					Dilution not used as a substitute for treatment.	3
X					Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)
	X				Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)
					Land Disposal Facilities	
X	X	X	X	X	Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)
X	X	X	X	X	Facility land disposes of restricted waste only if it meets applicable treatment standard.	40
X	X	X	X	X	Facility retains copies of generator notifications and certifications.	7(c)(1)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 10/7/97Identification Number PAD000737031Company/Facility/Site Name Cofin Specialty Steel

- This facility is a cold draw bar & wire mill which shapes stock bar & wire for use primarily by the tool industry (allen wrenches, hex keys, etc.). Stock bar/wire is pickled in sulfuric acid, then annealed in furnaces to soften it. The steel is then processed in the cleaning/pickle house which consists of the 2 sulfuric acid tanks, followed by 2 rinse tanks, a caustic permanganate tank, a phos coat tank, a soap tank, and a lime tank. The phos coat, soap, and lime tanks are used to lubricate the stock to aid in drawing. After the pickle house, the steel is cold drawn, and depending on the end use, may be annealed and pickled again. Grinding may also be performed as finishing step. Chemicals/substances used on the pickle line are not stored when they are determined to be spent. Rather, they are piped directly into a tanker truck for offsite treatment/disposal. Pickle tank bottoms and pickle house cleanup waste are stored in drums. These drums are staged in the pickle house utilizing the pickle tank containment. Wheelabrator dust (hazardous for cadmium) is stored in drums outside. *These drums should be stored inside where containment is available*. Typically, this facility generates and stores 3-5 drums of hazardous waste prior to shipment offsite.

An acid recovery tower is used to reclaim/treat sulfuric acid from the pickle line. There are two sulfuric acid pickle tanks in the pickling house which are used in rotation. As one tank's acid becomes spent, it is piped to the tank at the top of the acid recovery tower where it is chilled and agitated to precipitate ferrous sulfate crystals. The "recovered" acid is piped to a lower tank while the crystals are dropped into a vacuum box directly below the chilling tank. The crystals are rinsed with water and a vacuum draws off the rinsate, which is added to the recovered acid. The recovered acid is heated and piped back into the tank in the pickle house. Inspection and treatment records are being maintained for the acid recovery tower. The ferrous sulfate crystals are stored in a covered bin outside and are sold to AIC/QC Corp. for use in the manufacture of magnetic tape.

The facility operates a captive waste water treatment plant (WWTP) for the neutralization and treatment of rinsewater from the pickling and alkaline cleaning and coating operations.

- Items are marked 'not determined' on this report because there was no storage of hazardous waste onsite during this inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date _____

Inspector (signature) _____

Date _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 10/7/97 Identification Number PAD 000737031
Company/Facility/Site Name Coffin Specialty Steel

* NOTE *

A written coproduct determination should be completed for the ferrous sulfate crystals using the guidelines already in your possession. You should send a copy of the coproduct letter to this office by 27 October, 1997.

Source Reduction Strategies (SRS's) have been implemented for all waste streams except waste HCL and wheelabrator dust. You should develop SRS's for these waste streams and submit copies to this office by 27 October, 1997.

** VIOLATIONS **

Reference line item H007: Manifests MI4528834 and MI4528846 were not filled out completely. The transporter's Pennsylvania transporter ID number was missing, contrary to 25 Pa Code Ch. 262.20(g)(5). This violation is considered abated with the facility's understanding of the regulatory requirements and its assurance that future manifests will be more closely reviewed prior to the shipment of waste.

NOTHING FOLLOWS

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Person interviewed (signature) mailed Date _____
Inspector (signature) Tom Child Date 10/9/97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 6/26/95 Time start 0915 Time finish 1235
Name of Inspector Frank Calderon
Company, installation name Col-Fin Specialty Steel
Location Front St.
County Beaver Municipality Fallston
Identification number PAD000737031
Name of responsible official Dave Pasquale
Title President/owner
Mailing Address _____
Area code and telephone number _____
Name of person interviewed Steve Brown
Title Plant Engineer
Mailing address (if different from above) P.O. Box 562, Fallston, Pa 15066
Area code and telephone number 412-843-7315

1. Current waste handling method:

- a. ☒ On-site ☒ treatment, ☐ storage, ☐ disposal ☒ PBR
b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a. 8.67 tons/mo kg/mo.
b. _____ kg/yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D002/D062	Envirite Corp	Canton, OH disposal
D002/D004/D007	Envirite Corp	Canton, OH disposal
D006/D008/D018/D027	Safety Kleen	Wheeling, WV Recycle
D035/D039/D040		

4. Source Reduction: ☐ accomplished, ☒ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Col-Fin Specialty Steel ID Number PA0000737031 Date 6/26/95

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
	X			Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
	X			PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
	X			Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
	X			Shipping containers marked and labeled according to U.S. DOT	262.30(2)	H010
	X			Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
	X			Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter I	262.34(a)(2)	H014
	X			Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
	X			a). All containers of haz. waste in good condition	265.171	H016
	X			b). Containers compatible with hazardous waste being stored within	265.172	H017
	X			c). Containers of hazardous waste kept closed	265.173(a)	H018
	X			d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
	X			e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
	X			f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
	X			g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - 177	H022
	X			h). Proper containment and collection system(s)	265.178	H023
	X			Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

See summary

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**Hazardous Waste Inspection Report
Generators - Part B**

Col-Fin Specialty Steel

PAD 000737031

1-No Violation Observed

2-Not-Applicable

3-Not-Determined

4-Non-Compliance

6/26/95

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
	X			Exception reporting procedures followed	262.42	H028
	X			Hazardous waste disposal plan, if required	262.45	H029
	X			Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	X			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
X				Source reduction strategy prepared and available	262.80	H033

see
comments

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non-Compliance
Status					REQUIREMENT		Citation
1	2	3	4				40 CFR Part 268
					Generators		
X					Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
X					Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
X					Dilution not used as a substitute for treatment.		3
X					Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
					Storage Facilities		
					Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
					Containers marked to identify contents and accumulation date.		50(a)(2)
					Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
					Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
					Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
					Treatment Facilities, including PBR and RRR Facilities		
X					Dilution not used as a substitute for treatment.		3
X					Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
X					Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
					Land Disposal Facilities		
					Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
					Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
					Facility retains copies of generator notifications and certifications.		7(c)(1)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - CHEMICAL, PHYSICAL & BIOLOGICAL TREATMENT

Site Name Col-Fin Specialty Steel ID Number PAD000737031 Date 6/26/95

WWTP PBR

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBER
1	2	3	4			
X				Precautions taken for treating ignitable, reactive or incompatible waste or material	265.401(a)	H476
X				Treatment process or equipment managed to prevent leaks, rupture, corrosion or otherwise failing	265.401(b)	H477
X				Continuously fed treatment process or equipment equipped with a means to stop the inflow	265.401(c)	H478
X				Waste analysis and/or trial tests conducted on hazardous wastes substantially different than previously treated in that process or equipment or when hazardous waste is treated with a substantially different process than previously used	265.402	H479
X				Discharge control and safety equipment inspected once each operating day	265.403(1)	H480
X				Monitoring equipment data inspected once each operating day	265.403(2)	H481
X				Construction materials of treatment process or equipment inspected weekly	265.403(3)	H482
X				Construction materials or discharge confinement structure and area immediately surrounding, inspected weekly	265.403(4)	H483
	X			Closure requirements are complied with	265.404	H484
	X			Precautions taken for handling reactive, ignitable or incompatible wastes or materials	265.405 265.406	H485

See comments

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 6/26/95 Identification Number PAD000 737031
 Company/Facility/Site Name Cal-Fin Specialty Steel
 - Facility has switched all but one of their parts cleaners to non-hazardous solvents. Maintenance shop has the only parts cleaner using hazardous solvent.
 - Facility has notified of hazardous waste PBR activities for its captive Waste Water Treatment Plant (WWTP) and its KSF acid regeneration tower.
 Note: - Facility should immediately submit forms 55 Ann & 55 C Ann (Annual Reports) for these PBR activities, as this was not done for 1994 reporting year.
 - Facility should update PPC plan to include brief descriptions of these PBR activities.
 - For the acid regeneration tower, facility conducts inspections of process equipment, but keeps no written records. You should implement a written inspection program for this area as per 25 Pa Code § 266.90.
 - Reference lines H480, H482 & H483 of the inspection report, written inspection records should also be maintained for these areas of the WWTP. This is not currently done.
 - Lines H014-H024 of the inspection report are marked 'Not Applicable' because facility has no hazardous waste containers or tank storage. Spent pickle liquor is pumped directly from pickle tubs into tanker trucks; spent KMnO₄ is pumped directly from process tank into tanker truck.
 - Reference line H033 of inspection report, Facility should develop a written Source Reduction Strategy for spent HCl pickle liquor. All other hazardous waste streams have SAR's.
 ** Facility generates ferrous sulfate crystals through use of the acid regeneration tower. These crystals are sold to several companies for use as water flocculants and in Waste Land Fill operations/stabilization. Facility calls this material a co-product and should therefore provide the Dept. with a written Coproduct determination. This letter should be completed and submitted within 45 days continued →

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____

Inspector (signature) _____ Date _____

INSPECTION REPORT COMMENTS

Date of Inspection 6/26/95 Identification Number PAD 000737031

Company/Facility/Site Name Col-Fin Specialty Steel Corp

receipt of this report to: Dept. of Environmental Resources - SW Regional Office

Waste Management - Attn: Gail Campbell

400 Waterfront Dr.

Pittsburgh, Pa 15222-4745

Nothing Follows

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Person interviewed (signature) mailed Date 6/26/95

Inspector (signature) Frank C. Caldwell Date 6/26/95

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 10/12/94 Time start 0957 Time finish 1050
Name of Inspector Frank Calderon
Company, installation name Col-Fin Specialty Steel
Location Front St
County Beaver Municipality Fallston
Identification number PAD000737631
Name of responsible official Dave Pasquale
Title President/Owner
Mailing Address _____
Area code and telephone number _____
Name of person interviewed Steve Brown
Title Plant Engineer
Mailing address (if different from above) P.O. Box 562 Fallston, Pa 15066
Area code and telephone number 412-843-7315

1. Current waste handling method:

- | | | | | |
|-------------------------------------------------|------------------------------------------------|-----------------------------------|----------------------------------------------|---------------------------------------------|
| a. <input checked="" type="checkbox"/> On-site | <input checked="" type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input checked="" type="checkbox"/> PBR |
| b. <input checked="" type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input checked="" type="checkbox"/> recycle, | <input checked="" type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input checked="" type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. _____ kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type

4. Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Cold-Fin Specialty Steel ID Number PAD 000 737 031 Date 10/02/94

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
		X		Hazardous waste determination, performed on all waste streams	262.11	H001
		X		Identification number	262.12	H002
		X		Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
		X		Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
		X		PA manifest used for intrastate shipments	262.20(b)	H005
		X		TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
		X		Manifests filled out properly and completely	262.20(g)	H007
		X		Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
		X		Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
		X		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
		X		Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
		X		Placards offered to transporter	262.33	H012
		X		Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
		X		Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
		X		a). All containers of haz. waste in good condition	265.171	H016
		X		b). Containers compatible with hazardous waste being stored within	265.172	H017
		X		c). Containers of hazardous waste kept closed	265.173(a)	H018
		X		d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
		X		e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
		X		f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
		X		g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
X				h). Proper containment and collection system(s)	265.178	H023
		X		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
		X		On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

Col-Fin Specialty Steel
PAD000737031 10/12/94

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
		X		Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
		X		Exception reporting procedures followed	262.42	H028
		X		Hazardous waste disposal plan, if required	262.45	H029
		X		Spill reporting procedures followed	262.46(a)	H030
		X		Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
		X		Special requirements followed for international shipments	262.50, .53, .55, .60	H032
X				Source reduction strategy prepared and available	262.80	H033

See
Comments

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 10/12/94 Identification Number PAD000737031

Company/Facility/Site Name Col-Fin Specialty Steel

Reinspection conducted pursuant to Notice of Violation dtd 8/31/94.

Reference violations noted during 8/26/94 inspection for Hazardous Waste Generators:

- Containment requirement fulfilled - purchased a 4 drum capacity pallet/bin containment system. Facility infrequently has drum waste, and quantity is small.
- Quarterly reports for previous reporting periods have been submitted.
- Source Reduction Strategy not completed yet. Will be completed by and reviewed on 18 Nov, 94.

Note - Notification for Hazardous Waste Activity (Waste Water treatment & Acid Reclamation) has been sent to Beaver Falls Office of DER and is being sent to Hbg office.

Reference violations noted during 8/26/94 inspection for Residual Waste Generators:

- Analyses (Form 26 R's) and source reduction strategies (Form 25 R's) currently being worked on. Mr. Brown is loading forms and all information into facility's computer system. This work should also be completed on 18 Nov, 94 and will be reviewed on that day.

Nothing Follows

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Marked Date 10/12/94

Inspector (signature) Frank Caldwell Date 10/12/94



Need form

GEN

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES**

SOUTHWEST REGION - FIELD OPERATIONS
WASTE MANAGEMENT

400 Waterfront Drive
Pittsburgh, Pennsylvania 15222-4745
(412) 442-4000 (answers 24 hrs.)

356

November 19, 1992

NOTICE OF VIOLATION

CERTIFIED MAIL #P 249 041 510

Col-Fin Specialty Steel Corporation
P.O. Box 562, Front Street
Fallston, PA 15066-0562

NOV 25 1992

Attention: Steve Brown, Plant Engineer

RE: Col-Fin Speciality Steel Corporation
PAD000737031
Fallston Borough
Beaver County

Dear Mr. Brown:

A record review conducted by the Department has revealed that Col-Fin Speciality Steel Corporation ("Col-Fin") is in violation of the Pennsylvania Solid Waste Management Act, Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. §6018.101, et seq., and the Rules and Regulations promulgated thereunder.

Specifically, Col-Fin offered for transportation hazardous wastes accompanied by an incomplete manifest. The manifest document number, date, missing information and section(s) of the Rules and Regulations violated are:

1. PAC8537476
2. November 5, 1992
3. Section 14b, unit measure of waste was omitted.
4. Section 262.20(a),(g)(8).

The violations above also constitute violations of Section 403(b)(8), 610(4), and 610(9) of the Solid Waste Management Act, 35 P.S. §§6018.403(b)(8), 6018.610(4), and 6018.610(a) for each incomplete item on the listed manifest(s).

November 19, 1992

In order to resolve the above described violations, the Department will be contacting you in the near future to discuss settlement through payment of appropriate civil penalties. Failure to do so may result in further action being taken against you by the Department of Environmental Resources.

This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations involved arising prior to or after the issuance of this Notice of Violation or the conditions upon which the Notice of Violation was based, nor shall this Notice of Violation be construed so as to waive or impair any rights of the Department of Environmental Resources heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

Should you have any questions, please feel free to contact this office.

Sincerely,



Robert J. Musser
Compliance Specialist
Waste Management
Southwest Region - Field Operations

RJM:njh

cc: Regional
Chron
Leonard Tritt, Central Office.

Need form

GEN
TSD?



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

SOUTHWEST REGION - FIELD OPERATIONS
WASTE MANAGEMENT

400 Waterfront Drive
Pittsburgh, Pennsylvania 15222-4745
(412) 442-4000 (answers 24 hrs.)

November 19, 1992

NOTICE OF VIOLATION

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Col-Fin Specialty Steel Corporation
P.O. Box 562, Front Street
Fallston, PA 15066-0562

NOV 28 1992

DEPT. OF ENVIRONMENTAL RESOURCES

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PAD000737031
Fallston Borough
Beaver County

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Sincerely,



Robert J. Musser
Compliance Specialist
Waste Management
Southwest Region - Field Operations

RJM:njh

cc: Regional
Chron
Leonard Tritt, Central Office .

EVALUATION - VIOLATION - ENFORCEMENT FORM

Handler ID Number		Handler Type		Date Submitted	
P A D 0 0 0 7 3 7 0 3 1		LDF [] TSF [] INC [] LQG [x] SQG [] TRA []		1 / 1 / 9 9 2	
Handler Name COL-FIN SPECIALTY STEEL					
Street P.O. BOX 562 FRONT STREET			City FALLSTON		

EVALUATION	Add <input checked="" type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>			
Date	Number	Agency	Type	Reason	Branch	Person
1 / 1 / 9 9 2		S	N R R			ADD

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)								
GER	GPT	TGR	DCH	DGW	DMC	DPP	CAS	
GGR	GRR	TMR	DCL	DIN	DMR	DSI	FEA	
GLB	GSC	TOR	DCP	DLB	DOR	DTR	CSS	
GMR	GSQ	TRR	DFR	DLF	DOT	DTT		
GOR	GEX	TWD	DGS	DLT	DPB	DWP		
Comments								

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION							
Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION		Add <input checked="" type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>	Link to Above Evaluation? (Y/N) <input checked="" type="checkbox"/>	
Agency	Number	Area	Class	Regulation Type	Regulation Citation	
S		G H R	2			
Date Determined		Priority	Branch	Person	Returned to Compliance	
1 / 1 / 0 5 9 2				ASO	Scheduled	Actual
					1 / 2 5 9 2	1 / 2 5 9 2
Comments						

VIOLATION		Add <input type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>	Link to Above Evaluation? (Y/N) <input type="checkbox"/>	
Agency	Number	Area	Class	Regulation Type	Regulation Citation	
Date Determined		Priority	Branch	Person	Returned to Compliance	
					Scheduled	Actual
Comments						

Handler ID Number				Handler Name			
<input type="checkbox"/> VIOLATION <input type="checkbox"/> Add <input type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/> Link to Above Evaluation? (Y/N)							
Agency	Number	Area	Class	Regulation Type	Regulation Citation		
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		
Date Determined		Priority	Branch	Person	Returned to Compliance		
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	Scheduled	Actual	
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	
Comments <input type="text"/>							

ENFORCEMENT				Add <input checked="" type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>	Link to Above Evaluation? (Y/N) <input type="checkbox"/>
Date	Number	Agency	Type	Branch	Person	Attorney Initials	
04/11 11/25	<input type="text"/>	<input type="text" value="S"/>	<input type="text" value="5:50"/>	<input type="text"/>	<input type="text" value="P.A.B.M."/>	<input type="text"/>	
Penalty Assessed \$				Settled \$			
<input type="text" value="5:00"/>				<input type="text" value="5:00"/>			

POLLUTION PREVENTION ENFORCEMENT COMPONENTS COVERED BY THIS ACTION

PPE - Pollution Prevention <input type="checkbox"/>	EAE - Environmental Auditing <input type="checkbox"/>
PRE - Pollution Reduction <input type="checkbox"/>	EPE - Environmental Public Awareness <input type="checkbox"/>
ERE - Environmental Restoration <input type="checkbox"/>	(mark only one in this section)

VIOLATIONS COVERED BY ABOVE ENFORCEMENT ACTION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined
<input type="text" value="S"/>	<input type="text"/>	<input type="text" value="6m2"/>	<input type="text" value="11/19/92"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

PENALTY PAYMENTS

Date	Amount	Date	Amount
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Comments <input type="text"/>			



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

SOUTHWEST REGION - FIELD OPERATIONS
WASTE MANAGEMENT

400 Waterfront Drive
Pittsburgh, Pennsylvania 15222-4745
(412) 442-4000 (answers 24 hrs.)

November 25, 1992

CERTIFIED MAIL #P 213 150 371

Col-Fin Specialty Steel Corporation
P. O. Box 562, Front Street
Fallston, PA 15066-0562

Attn: Steve Brown, Plant Engineer

RE: Col-Fin Specialty Steel Corporation
PAD000737031
Fallston Borough
Beaver County

Dear Mr. Brown:

Enclosed are three copies of the proposed consent assessment of civil penalty proposed as a means of settlement of the violations which occurred at the above referenced site on November 5, 1992. Please review the documents carefully. If this settlement is acceptable, please have all copies signed and returned with payment within two weeks of receipt of this letter. Upon receipt, I will obtain the remaining signatures, date the first page, and return one copy to you for your files. If this is not acceptable, or if you should have any questions, please contact Bob Musser, Compliance Specialist, at the above number.

Please be notified that if payment is not received within the required time period, this settlement proposal will become void and we will pursue other enforcement options.

Sincerely,

Anthony D. Orlando
Regional Manager
Waste Management
Southwest Region - Field Operations

ADO:RM:ld

Enclosure

cc: Regional
Chron

bc: B. Musser, M. Russell, M. Watson, G. Campbell

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

IN THE MATTER OF:

Col-Fin Specialty Steel : Solid Waste Management Act
Corporation
PAD000737031
Fallston Borough
Beaver County

CONSENT ASSESSMENT OF CIVIL PENALTY

NOW, this _____ day of _____, 1992, the
Commonwealth of Pennsylvania, Department of Environmental Resources
("Department"), has determined the following findings of fact:

A. The Department is the agency with the duty and authority to administer and enforce the Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, as amended, ("SWMA"), 35 P.S. §6018.101 - 6018.1003 and the rules and regulations adopted thereunder.

B. Col-Fin Specialty Steel Corporation (hereinafter "Col-Fin") is a corporation and maintains a business address of P.O. Box 562, Front Street, Fallston, PA 15066-0562.

C. On or about November 5, 1992, Col-Fin caused or allowed a shipment of hazardous waste to be transported off site without first providing the total quantity of the shipment on the manifest associated with the shipment, in violation of Sections 403(a), 403(b)(5) and (8), and 610(4), (6) and (9) of the SWMA 35 P.S. §§6018.403(a), 6018.403(b)(5) and (8), and 6018.610(4), (6) and

(9), and 25 Pa. Code §262.20(g)(8). Specifically, Col-Fin caused or allowed a drum of hazardous waste identified by EPA number D008 and D027 to be transported off site by Safety-Kleen Corporation under Pennsylvania manifest number PAC8537476 on November 5, 1992 without first filling in Item 14b on the manifest to reflect the unit measure of waste.

D. The violations described in Paragraph C constitute unlawful conduct and a public nuisance pursuant to §§610 and 601 of the SWMA, 35 P.S. §§6018.610 and 6018.601.

E. Section 602 of the SWMA, 35 P.S. §6018.605, provides that the Department may assess a civil penalty of up to TWENTY FIVE THOUSAND DOLLARS (\$25,000.00) per day for each violation of the SWMA.

ASSESSMENT

After complete negotiations of all matters set forth in this Consent Assessment, the parties intending to be legally bound, the Department hereby assesses and Col-Fin agrees that:

1. Pursuant to the Department's authority under Section 605 of the SWMA, 35 P.S. §6018.605, a Civil Penalty in the amount of FIVE HUNDRED DOLLARS (\$500.00) is hereby assessed against and agreed to by Col-Fin. Payment of this Civil Penalty shall be made as follows: Submittal of a certified check or the like made payable to the "Commonwealth of Pennsylvania, Solid Waste Abatement Fund", and forwarded to Anthony D. Orlando, Regional Manager, Waste Management, Pennsylvania Department of Environmental Resources, 400 Waterfront Drive, Pittsburgh, PA 15222-4745.

2. Col-Fin hereby consents to this Civil Penalty Assessment issued pursuant to Section 605 of the SWMA, 35 P.S. §6018.605 and waives its right to appeal from this Assessment which rights are available pursuant to Section 4 of the Environmental Hearing Board Act, the Act of July 13, 1988, P.L. 374, Act No. 1988-94, 35 P.S. §§7511-7516, and the Administrative Agency Law, the Act of June 4, 1945, P.L. 1388, as amended, 2 Pa. C.S. §§501-508 and 701-704.

3. By entering into this Consent Assessment of Civil Penalties, the Department only waives its right to bring an action for civil penalties for the specific violation(s) set forth in Paragraph C herein for the dates set forth therein. Nothing herein shall be construed to imply that the Department waives any other rights which it may have concerning said violation(s) or relieves Col-Fin from any future liability for environmental damages resulting from the activities described herein.

FOR COL-FIN SPECIALTY STEEL CORP.:

FOR THE DEPARTMENT OF ENVIRONMENTAL
RESOURCES:

The undersigned states subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authority, that he/she is authorized to execute this Agreement on behalf of Col-Fin.

Anthony D. Orlando Date
Regional Manager
Waste Management

Name Date

APPROVED AS TO FORM AND LEGALITY:

Title

George Jugovic, Jr. Date
Attorney for the Commonwealth

Name Date

Title

EVALUATION - VIOLATION - ENFORCEMENT FORM

Handler ID Number		Handler Type	
P: A: D: 0: 0: 2: 3: 4: 3: 6: 3: 0		LDF [] TSF [] INC [] LQG <input checked="" type="checkbox"/> SQG [] CEG [] TRA []	
Handler Name		Contact Name	Date Submitted
Dana Corp		Chet Sowa	0: 2: 2: 8: 9: 4
Street		City	
Robeson & Weiser Streets		Reading	

EVALUATION	Add <input checked="" type="checkbox"/>	Change	Delete
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Date	Number	Agency	Type	Reason	Branch	Person
0: 2: 1: 6: 9: 4		S	C: E: I			P. A. T. L. G.

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

GER	GPT	GBF	TWD	DGS	DLT	DPB	DWP
GGR	GRR	TGR	DCH	DGW	DMC	DPP	DBF
GLB	GSC	TMR	DCL	DIN	DMR	DSI	CAS
GMR	GSQ	TOR	DCP	DLB	DOR	DTR	FEA
GOR	GEX	TRR	DFR	DLF	DOT	DTT	CSS

Comments

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION	Add <input checked="" type="checkbox"/>	Change	Delete	Link to Above Evaluation? (Y/N)
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Agency	Number	Area	Class	Regulation Type	Regulation Citation
S		G: P: T	1	S. R.	25 Pa Code Chapter 262.34(a)(3), 265.173(c), 262.34(a)(4)
Date Determined	Priority	Branch	Person	Scheduled	Actual
0: 2: 1: 6: 9: 4			P. A. T. L. G.	0: 2: 1: 7: 9: 4	0: 2: 1: 6: 9: 4

Comments Drum not labelled

VIOLATION	Add	Change	Delete	Link to Above Evaluation? (Y/N)
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Agency	Number	Area	Class	Regulation Type	Regulation Citation
Date Determined	Priority	Branch	Person	Scheduled	Actual

Comments

Handler ID Number	Handler Name
PAD002343630	Dana Corp

VIOLATION		Add	Change	Delete	Link to Above Evaluation? (Y/N)
Agency	Number	Area	Class	Regulation Type	Regulation Citation
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Date Determined		Priority	Branch	Person	Returned to Compliance
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	Scheduled <input type="text"/> Actual <input type="text"/>
Comments <input type="text"/>					

VIOLATION		Add	Change	Delete	Link to Above Evaluation? (Y/N)
Agency	Number	Area	Class	Regulation Type	Regulation Citation
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Date Determined		Priority	Branch	Person	Returned to Compliance
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	Scheduled <input type="text"/> Actual <input type="text"/>
Comments <input type="text"/>					

VIOLATION		Add	Change	Delete	Link to Above Evaluation? (Y/N)
Agency	Number	Area	Class	Regulation Type	Regulation Citation
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Date Determined		Priority	Branch	Person	Returned to Compliance
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	Scheduled <input type="text"/> Actual <input type="text"/>
Comments <input type="text"/>					

ENFORCEMENT		Add	Change	Delete
Date	Number	Agency	Type	Branch
<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Person		Attorney Initials		
<input type="text"/>		<input type="text"/>		
Penalty Assessed \$		Settled \$		
<input type="text"/>		<input type="text"/>		

POLLUTION PREVENTION ENFORCEMENT COMPONENTS COVERED BY THIS ACTION

PPE - Pollution Prevention <input type="checkbox"/>	EAE - Environmental Auditing <input type="checkbox"/>
PRE - Pollution Reduction <input type="checkbox"/>	EPE - Environmental Public Awareness <input type="checkbox"/>
ERE - Environmental Restoration <input type="checkbox"/>	

VIOLATIONS COVERED BY ABOVE ENFORCEMENT ACTION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

PENALTY PAYMENTS

Date	Amount	Date	Amount
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

Hazardous Waste Inspection Report
Generators - Part A

Jumis 2/28/94

Date of inspection 2/16/94 Time start 11:00 AM Time finish 3:00 PM
 Name of inspector Tim Leon Guerrero
 Company, installation name Dana Corp.
 Location Robeson & Weiser Streets
 County Berks Municipality City of Reading
 Identification number PAD002343630
 Name of responsible official Mike Green
 Title General Manager
 Mailing address P.O. Box 13459
 Area code and telephone number (610) 371-7100
 Name of person interviewed Chet Soual
 Title Environmental Engineer
 Mailing address (if different from above) _____
 Area code and telephone number (610) 371-7275

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☒ treatment, ☒ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. avg. 710 kg./mo.
 b. 8527 kg./yr. * Scan 1993 Quarterly Reports

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D001, D006, D007, D008	Petro-Chem Processing Inc.	Detroit, MI fuel blend, incineration
D007	" " " "	" " " "
D001, D008, D018	Republic Environmental (1992)	Hatfield PA TSD

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Dana Corporation ID Number PAD002343630 Date 2/16/94

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
1				Hazardous waste determination, performed on all waste streams	262.11
1				Identification number	262.12
1				Hazardous waste shipments offered only to licensed transporters	262.12(d)
1				Authorization received from TSD facility for wastes shipped off-site within PA	262.13
1				PA manifest used for intrastate shipments	262.20(b)
1				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)
1				Manifests filled out properly and completely	262.20(g)
1				Manifests routed properly and within time limits (7 days)	262.23(e)(f)
1				Proper U.S. DOT shipping containers or packages being used	262.30(1)
		3		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)
		3		Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)
		3		Placards offered to transporter	262.33
1				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)
	2			Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)
			4	Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)
1				a). All containers of haz. waste in good condition	265.171
1				b). Containers compatible with hazardous waste being stored within	265.172
1				c). Containers of hazardous waste kept closed	265.173(a)
1				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)
			4	e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)
1				f). Haz. waste accumulation areas inspected at least weekly	265.174
1				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177
		3		h). Proper containment and collection system(s)	265.178
			4	Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)
1				On the job or classroom personnel training program as per 265.16	262.34(a)(5)

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
1				Records retained at designated location for 20 years	262.40(a)
1				Quarterly reports submitted to the Department	262.41(a)
1				Exception reporting procedures followed	262.42
	2			Hazardous waste disposal plan, if required	262.45
1				Spill reporting procedures followed	262.46(a)
1				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)
	2			Special requirements followed for international shipments	262.50, .53, .55, .60
		3		Source reduction strategy prepared and available by January 7, 1994	262.80

Inspection Report Comments

Date of Inspection 2/16/94 Identification Number PAD002 343630
Company/Facility/Site Name Dana Corp

DER Official: Tim Leon Guerrero
Dana Officials: Fred Bube (2/16/94), Chet Sowal (2/17/94)
Date of Inspection: 2/16/94 & 2/17/94
Time of Inspection: 11:00-3:00 (2/16/94), 10:15-12:00 (2/17/94)

Hazardous-Waste Generation and Storage

Dana's hazardous waste is generated from a painting operation on its Heavy-Truck Frame Line. Two waste streams are produced. One is a solid waste referred to as "scrap" paint. The "scrap" paint waste is a residual material from the painting operation. It is a solid waste and is manifested as D007 waste. The second haz-waste stream is referred to as flammable-liquid waste. It is produced when the paint which is recycled in the painting booth is no longer usable. This liquid-waste stream is manifested as D001, D006, D007, and D008 waste. These wastes are placed in separate 55 gallon drums. The drums are labelled by plant personnel. When these drums are full, they are taken to the hazardous-waste storage area (Goshert Yard). The hazardous-waste storage area is surrounded by an approximately 4 inch curbing which acts as containment for the area. Potential run-on is discouraged by this curbing and a roof over the haz-waste area. Some snow and ice had entered the storage area. Ice has also accumulated to the top of the containment curb on the Spring St side of the storage area. This situation could allow run-on into the storage area.

- * Dana Corp should attempt to prevent run-on into the hazardous-waste storage area.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) Chet Sowal Date 2/28/94
Inspector (signature) Timothy A. Leon Guerrero Date 2/28/94
Page 4 of 7

Inspection Report Comments

Date of Inspection 2/16/94 Identification Number PAD002343630
Company/Facility/Site Name Dana Corp

The following were noted in the hazardous-waste storage area on 2/16/94:

- 8 55 gal drums labeled "scrap paint" each with an accumulation date
- 2 55 gal drums which had blank labels placed on the top of the drum
- 3 leaking or punctured 55 gal drums

One of the drums contained concentrated paint product.

Another drum contained a petroleum product that had leaked into the containment area and had mixed with some standing water. The third drum contained gear oil and was visibly punctured. This drum was lying on its side and did not appear to have leaked its contents into the containment area.

The two drums that had blank labels should have been labeled with a waste description and an accumulation date. This is contrary to 25 Pa Code Chapter 262.34(b), 265.173(c), and 262.34(a). Chris Lambie relabelled these two drums according to log entries recorded by Dana personnel.

- * Dana Corp should ensure that all containers of hazardous waste have a label that records the container's contents and an accumulation date

The spilled material noted in the containment area was placed in a 55 gallon drum and will be disposed of by Safety-Kleen Corp (observed area on 2/17/94).

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve as a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) [Signature] Date 2/28/94

Inspector (signature) [Signature] Date 2/28/94

Inspection Report Comments

Date of Inspection 2/16/94 Identification Number PAD002 343 630
Company/Facility/Site Name Dana Corp

Paper Work

The following were reviewed:

- Quarterly Reports for 1993 and the 3rd and 4th quarters of 1992
- Manifests from 9/29/92 thru present
- Waste analyses for the scrap paint and the flammable-liquid wastes
- TSD authorization from Petro-Chem Processing (Dana's current TSD)
- Dana Corp's training program
- Dana Corp's PPC plan, next complete update March 1995
- Weekly inspections of the Hazardous-Waste Storage Area

Miscellaneous

Dana Corp operates a waste-water treatment plant. This plant treats waste water from a cleaning operation. A waste analysis of the waste water indicates that it is non-hazardous (residual). The waste water is screened to remove the large debris. This material is sent to Pine Grove Landfill. The water is then passed through a filter media to separate the oily residue from the water. The water is discharged to the City of Reading POTW. Dana holds a permit from the city and conducts quarterly tests in conjunction with the city. The oily residue is disposed of by Safety-Kleen Corp.

- * Dana Corp should treat their waste-water treatment plant as a residual waste permit-by-rule. To this end, Dana should comply with the requirements outlined in 25 Pa Code Chapter 287.102 (a) & (c).

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

Date

2/28/94

Inspector (signature)

Date

2/28/94Page 6 of 7

Inspection Report Comments

Date of Inspection 2/16/94 Identification Number PADO02343630
Company/Facility/Site Name Dana Corp

VIOLATIONS

- Two 55 gal drums in the hazardous-waste storage area were not labelled with a waste description or an accumulation date. This is contrary to 25 Pa Code Chapter 262.34(a)(3), 265.173(c), and 262.34(a)(4). The two drums noted here were labelled with the necessary information prior to the 2/17/94 visit.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) [Signature] Date 2/23/94
Inspector (signature) [Signature] Date 2/28/94
Page 7 of 7

February 21, 1994

SUBJ: DER Inspection

On February 16, 1994 DER inspected the facility. Timothy A. Leon Guerrero, Solid Waste Specialist, found the Spring Street Yard hazardous waste storage area to be in violation. There were barrels on their sides with punctures in them, containing virgin oil and paint. The pit was covered with oily water because of severe weather conditions. The storage area was immediately attended to by pumping out the pit into a 500 gallon mobile tanker and transferring it to the waste oil storage tanks in the Lewis Building. From here, Safety-Kleen will take the waste to be properly handled. The virgin paint was taken to the paint line to be used for production. Timothy Leon Guererro inspected the cite again on February 17, 1994 and found it to be acceptable. There were no fines levied for this incident and steps were taken to insure the prevention of this situation in the future.

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection 9/12/89 Time start 9:30 Time finish 3:00
 Name of inspector Mark H. Russell
 Company, installation name Col-Fin
 Location Fallston Front St.
 County Beaver Municipality Fallston
 Identification number PA D000737031
 Name of responsible official Dave Pasquale
 Title President
 Mailing address PO Box 562, Fallston, PA 15066
 Area code and telephone number 412 843 7315
 Name of person interviewed Steve Brown
 Title Plant Engineer
 Mailing address (if different from above) _____
 Area code and telephone number _____

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
 c. ☒ Off-site ☒ treatment, ☐ storage, ☒ disposal
 d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 439.4 tons/quarter kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>K062</u>	<u>Envirofit</u>	<u>SE. Canton, OH treatment</u>
<u>WTP sludge D007/D008</u>	<u>Envirofit</u>	<u>SE. Canton, OH treatment</u>
<u>solvent D001</u>	<u>Saffy Klean</u>	<u>Wheeling, WA recycle</u>

PADO 00737031
9/12/89Hazardous Waste Inspection Report
Generators - Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
		X		Hazardous waste determination, copies available		(b)
X				Identification number		(c)(1)
X				Hazardous waste shipments offered only to licensed transporters		(c)(4)
X				Authorization received from TSD facility for wastes shipped off-site		(d)
X				PA manifest used for intrastate shipments		(e)(2)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
				Manifests filled out properly and completely		(e)(7)
X				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
X				Proper U.S. DOT shipping containers or packages		(f)(1)(i)
X				Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
X				Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
X				Placards offered to transporter		(f)(2)
X				Wastes accumulated on-site for less than 90 days		(g)(1)(i)
	X			Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
	X			Containers managed in accordance with 75.265(q)(1)–(9)		(g)(1)(iii)
	X			Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
				Records retained at designated location for 20 years		(h)
X				Quarterly reports submitted to the Department		(i)
X				Exception reporting procedures followed		(j)
	X			Hazardous waste disposal plan, if required		(l)
X				Spill reporting procedures followed		(m)(1)
X				Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
X				Special requirements followed for international shipments		(o)
X				On the job or classroom personnel training program (75.265(f))		(g)(1)(6)
	X			Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 9/12/89 Identification Number PA D000737031
Company, Installation Name Col-Fin
County Beaver Municipality Fallston

Facility has pickle acid regeneration tower which works by refrigerating acid to precipitate iron sulfate crystals which are recycled/sold as product for several uses. The status of the towers contain ment and the crystals needs to be further clarified, a follow-up inspection will be scheduled.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) mailed Date _____
Inspector (signature) [Signature] Date 9/15/89

Hazardous Waste Inspection Report
Generators — Part A

TC Rule

Date of inspection 5/3/91 Time start 1:00 Time finish 4:00
 Name of inspector Mark Russell
 Company, installation name Cal-tin
 Location Falls Jan, Front St.
 County Beaver Municipality Falls Jan
 Identification number PAD 000 73 7031
 Name of responsible official Dave Pasquale
 Title President
 Mailing address PO Box 562, Falls Jan PA 15066
 Area code and telephone number 412 843 7315
 Name of person interviewed Steve Brown
 Title Plant Engineer
 Mailing address (if different from above) _____
 Area code and telephone number _____

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☒ On-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim
 c. ☒ Off-site ☒ treatment, ☐ storage, ☒ disposal
 d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. _____ kg./mo.
 b. 273.7 T/yr 1990 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D001 D039	Safety Kleen	Wheeling WV recycle
D002 K062	Enviroite	Canton OH treat dispose
D001	Safety Kleen	New Castle KY fuels

2

3

Hazardous Waste Inspection Report
Generators — Part B

1—Non-Compliance, 2—Compliance, 3—Not Applicable, 4—Not Determined					
Compliance Status				REQUIREMENT	Chapter Citation
1	2	3	4		75.262
	X			Identification number	(c)(1)
	X			Hazardous waste shipments offered only to licensed transporters	(c)(4)
	X			Authorization received from TSD facility for wastes shipped off-site	(d)
	X			PA manifest used for intrastate shipments	(e)(2)
	X			Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)
	X			Manifests filled out properly and completely	(e)(7)
	X			Manifests routed properly and within time limits (7 days)	(e)(14) or (15)
	X			Proper U.S. DOT shipping containers or packages	(f)(1)(i)
	X			Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
	X			Containers of 110 gal. or less marked with required PA label	(f)(1)(iii)
	X			Placards offered to transporter	(f)(2)
	X			Wastes accumulated on-site for less than 90 days	(g)(1)(i)
	X			Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii)
	V			Containers managed in accordance with 75.265(q)(1)–(9)	(g)(1)(iii)
	X			Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
	X			Records retained at designated location for 20 years	(h)
	X			Quarterly reports submitted to the Department	(i)
	X			Exception reporting procedures followed	(j)
		X		Hazardous waste disposal plan, if required	(l)
	X			Spill reporting procedures followed	(m)(1)
	X			Preparedness, Prevention and Contingency Plan and implemented	(m)(5)
		X		Special requirements followed for international shipments	(o)
	X			On the job or classroom personnel training program [75.265(f)]	(g)(1)(6)
	X			Drum accumulation area inspected & inspection logged weekly as per 75.265(q)(5)	(g)(1)(iii)
	X			TC Rule	262.11



Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable					3-Not Determined					4-Non-Compliance				
Status				REQUIREMENT												Citation			
1	2	3	4													40 CFR Part 268			
				Generators															
✓				Notification sent with shipments of wastes that do not meet treatment standards.												7(a)(1)			
✓				Notification and certification sent with shipments of wastes meeting treatment standards.												7(a)(2)			
✓				Dilution not used as a substitute for treatment.												3			
✓				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.												7(a)(5), (a)(6)			
				Storage Facilities															
				Facility verifies generators classification of waste in accordance with waste analysis plan.												25 Pa Code 265.13(c)			
				Containers marked to identify contents and accumulation date.												50(a)(2)			
				Notification sent with shipments of wastes that do not meet treatment standards.												7(a)(1)			
				Notification and certification sent with shipments of wastes meeting treatment standards.												7(a)(2)			
				Facility maintains records of documents produced pursuant to LDR requirements.												7(a)(6)			
				Treatment Facilities, including PBR and RRR Facilities															
				Dilution not used as a substitute for treatment.												3			
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.												7(b)			
				Certification and/or notification sent with shipments of waste.												7(b)(4), (b)(5), (b)(6)			
				Land Disposal Facilities															
				Facility tests wastes received to assure compliance with applicable treatment standards.												7(c)(2)			
				Facility land disposes of restricted waste only if it meets applicable treatment standard.												40			
				Facility retains copies of generator notifications and certifications.												7(c)(1)			

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 5/3/91 Identification Number PA D000737031
Company, Installation Name Col-fin
County Beaver Municipality Fallston

Pickle liquor waste acid regenerated on site in refrigeration tower. Ferrous Sulfate crystals sold to Enviroite where they are used for waste treatment. Enviroite handles all Col-fins hazardous and non-hazardous wastes except for parts cleaners and municipal wastes. Filter press has been installed for treatment ^{wast} plant sludge since last inspection. Sludge non-haz. Drawing tube oil sent out as hazardous to Saffy Klen - it is not always hazardous.

November 1991 containment wall around acid regeneration tower should be complete, PPC plan now covers acid tower. Waste acid pumped directly from pickle tanks - no waste acid accumulation tank used. Wastewater treatment plant being updated and should be on line end of June.

Land disposal restriction and TCLP inspection - no violation

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Stephen Brown Date 5/3/91
Inspector (signature) W. H. P. [unclear] Date 5/3/91

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Date of Inspection 3/6/96 Time start 1320 Time finish 1545
 Name of Inspector Frank Calderon
 Company, installation name Col-Fin Specialty Steel
 Location Front St.
 County Beaver Municipality Fallston
 Identification number PAD 000737031
 Name of responsible official Dave Pasquale
 Title President/owner
 Mailing Address _____
 Area code and telephone number _____
 Name of person interviewed Steve Brown
 Title Plant Engineer
 Mailing address (if different from above) P.O. Box 562, Fallston Pa 15066
 Area code and telephone number 412-843-7315

1. Current waste handling method:

- a. ☒ On-site ☒ treatment, ☐ storage, ☐ disposal ☒ PBR
 b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a. 4,985 gal/mo kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
0002/K062/H4L	Envirite Corp	Canton, OH That's dispose
0002/K062/H4504	" "	" "
KMNDY/0002,0007	" "	" "
0002 River water (H4504)	Onsite WWTP	
0002/line bath	Envirite & Chem-Met Services	Canton, OH / Wyandotte, MI
0006, 0008, 0018 0017, 0035	Safety Kleen	Wheeling, WV

4. Source Reduction: ☐ accomplished, ☒ proposed, ☐ not proposed

2

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Cot-Fin Specialty Steel ID Number PAD 000 737 031 Date 3/6/96

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
	X			Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
	X			PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
		X		Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
		X		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
		X		Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
		X		Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
		X		Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
		X		a). All containers of haz. waste in good condition	265.171	H016
		X		b). Containers compatible with hazardous waste being stored within	265.172	H017
		X		c). Containers of hazardous waste kept closed	265.173(a)	H018
		X		d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
		X		e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
X				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
		X		g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - 177	H022
X				h). Proper containment and collection system(s)	265.178	H023
		X		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025



1-No Violation Observed

2-Not-Applicable

3-Not-Determined

4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
	X			Exception reporting procedures followed	262.42	H028
	X			Hazardous waste disposal plan, if required	262.45	H029
	X			Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	X			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
X				Source reduction strategy prepared and available	262.80	H033

Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

Co-PA Specialty
PAD 000 737 031
3/6/96

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non-Compliance
Status					REQUIREMENT		Citation
1	2	3	4	40 CFR Part 268			
					Generators		
X					Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
X					Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
X					Dilution not used as a substitute for treatment.		3
X					Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
					Storage Facilities		
X	X	X	X	X	Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
X	X	X	X	X	Containers marked to identify contents and accumulation date.		50(a)(2)
X	X	X	X	X	Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
X	X	X	X	X	Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
X	X	X	X	X	Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
					Treatment Facilities, including PBR and RRR Facilities		
X					Dilution not used as a substitute for treatment.		3
X					Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
	X				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
					Land Disposal Facilities		
X	X	X	X	X	Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
X	X	X	X	X	Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
X	X	X	X	X	Facility retains copies of generator notifications and certifications.		7(c)(1)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 3/6/96 Identification Number PAD 0008737031
Company/Facility/Site Name Col-Fin Specialty Steel

- This facility is a cold draw bar & wire mill which shapes stock bar & wire for use primarily by the tool industry (allen wrenches, hex keys, etc.). Stock bar/wire is pickled in sulfuric acid, then annealed in furnaces to soften it. The steel is then processed in the cleaning/pickle house which consists of the 2 sulfuric acid tanks, followed by 2 rinse tanks, a caustic permanganate tank, a phos coat tank, a soap tank, and a lime tank. The phos coat, soap, and lime tanks are used to lubricate the stock to aid in drawing. An HCl tank was recently removed, but may be reintroduced in the future. It was used to brighten the appearance of certain types of steel after annealing. After the pickle house, the steel is cold drawn, and depending on the end use, may be annealed and pickled again. Grinding may also be performed as finishing step.

- The facility has notified the Dept. of both its captive wastewater treatment plant (wwtp) and Permit-By-Rule (PBR) for on-site reclamation of waste acid (acid recovery tower). Both of these activities were inspected and all records and regulatory requirements were in compliance.

- The WWTP operation is monitored by computer as well as by an operator. It is monitored constantly and is equipped with alarms.

- The acid recovery tower is used to remove iron from the sulfuric acid, thus reclaiming it. The process entails pumping the acid to the tower via pipe, and then agitating and cooling it to 45 F to precipitate the Fe. The agitator is stopped and the iron sulfate crystals settle into a cone at the bottom of the crystallizer tank. A vacuum filter separates the crystals from the acid, which is then heated in a tank prior to being piped into one of the pickle tanks. The crystals are rinsed with water and augered to a covered storage bin. The rinse water is added to the acid. The crystals are sold to Enviroline where they are used in delisting processes.

- Note: The iron sulfate crystals are considered a co-product by Col-Fin, however no written determination has been made or submitted to the Dept. You should complete this determination and contact Mr. Roof of the Dept.'s Central Office at 717-787-6239 for information on submission of your co-product determination.

- Facility has switched to the use of a non-hazardous parts cleaner solvent.

- No hazardous waste drum storage on-site at the time of the inspection, therefore line items H009 - H011, H014 - H020, H022, & H024 are marked 'Not Determined'.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____

Inspector (signature) _____ Date _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 3/6/96 Identification Number PAD000737031
Company/Facility/Site Name Col-Fin Specialty Steel

- Drums of hazardous waste are stored on containment pallets inside the plant due to the typically small amount of haz. waste stored in this manner.
- There is no storage of hazardous waste in tanks at this facility.
- Facility's wheelabrator dust is a hazardous waste and is collected in a dust collector. This dust is stored outside, in closed drums which are labelled, situated on concrete, and covered with plastic. There were no drums of this waste at the time of the inspection.
- ** Note - You should include this storage area on your inspection log sheets.
- Mud and debris from a recent flood was removed in the vicinity of the annealing furnaces. It is hazardous for lead and is stored outside in a tarped, labelled, roll-off box. It is scheduled for removal by Ecotron and is destined for Chem-Met Services.
- Facility completed a Hazardous Waste Biennial Report for 1994-1995.

NOTHING FOLLOWS

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) mailed Date _____
Inspector (signature) Frank Caldwell Date 3/11/96

HAZARDOUS WASTE INSPECTION REPORT
TSD Facilities - Part A

Date of inspection FEBRUARY 3, 1983 Time start 10:00 Time finish _____
Name of inspector MICHAEL D. WATSON
Company, installation name TOWNSEND TEXTRON - FALLSTON
Location FRONT STREET, FALLSTON, PA
County BEAVER Municipality FALLSTON
Identification number PAD000737031
Name of responsible official DON LORDO - BOB SPEED
Title QUALITY CONTROL MANAGER
Mailing address P.O. BOX 71 ELLWOOD CITY, PA. 16117
Area code and phone no. (412) 846-8643
Name of person interviewed DON LORDO
Title SAME
Mailing address (if different from above) SAME
Area code and phone no. SAME

1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ biological
b. ☒ Storage - ☐ containers, ☒ tanks, ☐ surface impoundments, ☐ waste piles
c. ☒ Disposal - ☐ land treatment, ☐ landfill, ☒ incineration, ☐ thermal treatment
d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Does the facility generate hazardous wastes? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

K062

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART B General p.1

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
	✓			Part A permit application submitted	(a) (2), (2) (2)
	✓			Identification number	(b)
	✓			Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department	(b) (1)
	✓			Waste streams not covered by permit approved by the Department before acceptance	(c) (1)
	✓			Chemical and physical analyses repeated as required	(c) (1)
	✓			All waste shipments inspected and sampled	(c) (2)
	✓			Waste analysis plan on-site	(c) (3)
	✓			24 hr. surveillance at active portion	(d) (2) (i)
	✓			Artificial barrier at active portion	(d) (2) (ii)
	✓			Proper signs posted and legible at a distance of at least 25 ft.	(d) (3)
	✓			Inspection schedule on-site	(e) (2)
	✓			Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction	(e) (4)
	✓			Immediate remedial action taken where a hazard is imminent or has already occurred	(e) (5)
	✓			On the job or classroom personnel training program	(f)
	✓			Records retained for each employee at facility of training, job title, and job description	(f) (6), (7)
	✓			Ignitable or reactive wastes separated from source of ignition or reaction	(g) (1)
	✓			No smoking signs displayed where there are hazards from ignitable or reactive wastes	(g) (1)
	✓			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	(g) (2)
	✓			Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel	(h) (2) (i)
	✓			Facility equipped with a device for summoning outside emergency assistance	(h) (2) (ii)
	✓			Facility equipped with fire control, spill control, and decontamination equipment	(h) (2) (iii)
	✓			Facility equipped with water at adequate volume and pressure to supply fire control equipment	(h) (2) (iv)
	✓			Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained.	(h) (3)
	✓			Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	(h) (6)
	✓			Contingency plan on-site and implemented	(i) (1)
	✓			Contingency plan describes action taken by personnel in the event of an emergency	(i) (3)
	✓			Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	(i) (5)

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HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART B General p.2.

1- NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
					75.265
✓				Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	(i) (6)
✓				Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item	(i) (7)
✓				Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	(i) (8)
✓				One employee designated as the primary emergency coordinator either on the premises or on call.	(i) (11)
	✓			Facility accepting only PA manifests	(j)
	✓			Manifests properly completed and routed within time limits (24 hrs.)	(j) (2) (c)
	✓			Manifest discrepancies resolved or reported within time limits	(j) (10) (i)
✓				Written operating record maintained on the premises	(k)
✓				Written operating record contains description and quantity of wastes and method of treatment, storage or disposal	(k) (2) (i)
✓				Written operating record contains location and quantity of each hazardous waste	(k) (2) (i)
✓				Written operating record contains results of waste analyses and treatability tests	(k) (2) (i)
✓				Written operating record contains reports and details of all incidents	(k) (2) (i)
✓				Written operating record contains records and results of all inspections	(k) (2) (v)
✓				Written operating record contains required monitoring, testing, and analytical data	(k) (2) (v)
✓				Written operating record contains closure and post-closure cost estimates	(k) (2) (v)
✓				All records retained on premises and available for inspection	(l)
✓				Quarterly reports submitted to the Department	(m)
	✓			Emissions, discharges, fires, explosions, and groundwater contamination reported as required	(m) (2)
	✓			Groundwater monitoring wells located at approved sites	(n) (2)
	✓			Adequate protection of groundwater monitoring wells	(n) (7)
	✓			Groundwater sampling and analysis plan on the premises	(n) (8)
	✓			Groundwater quality assessment and abatement outline on the premises	(n) (14)
	✓			Closure plan on the premises and up-to-date	(o) (2) - (9)
	✓			Post-closure plan on the premises and up-to-date	(o) (10) - (11)
	✓			Annual closure cost estimate on the premises and up-to-date	(p) (2) - (4)
	✓			Annual post-closure cost estimate on the premises and up-to-date	(p) (5) - (7)

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1- NON COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED					REQUIREMENT	CHAPTER CITATION
COMPLIANCE STATUS						
1	2	3	4			
		✓			Containers managed to prevent leaks and spills	(q) (1), (
		✓			Containers are compatible with waste stored.	(q) (2)
		✓			Containers are closed during storage	(q) (3)
		✓			Container storage area inspected weekly for leaks, deterioration, etc.	(q) (5)
		✓			Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q) (6)
		✓			Satisfactory procedures followed for handling incompatible wastes.	(q) (7), (
		✓			Incompatible wastes separated or protected from other materials.	(q) (9)
	✓				Containers and tanks labeled to identify accurately hazardous waste contained.	Act 97 Section 403(b)
		✓			Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(r) (2)
	✓				Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r) (3)
		✓			Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r) (4)
		✓			Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r) (4)
		✓			Continuously fed tanks equipped with a means to stop the inflow.	(r) (5)
✓					Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(r) (6)
✓					Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r) (7)
		✓			Discharge control equipment inspected once each operating day.	(r) (8) (i)
		✓			Monitoring equipment data inspected once each operating day.	(r) (8) (i)
		✓			Liquid level of tanks inspected once each operating day.	(r) (8) (i)
✓					Construction materials of tanks inspected weekly.	(r) (8) (i)
✓					Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r) (8) (v)
		✓			All hazardous waste removed from tanks and related appurtenances at closure.	(r) (9)
		✓			Placement of ignitable or reactive waste only with the Department's approval	(r) (10)
		✓			Covered tanks in which ignitable or reactive waste is treated or stored meet NEPA buffer zone requirements.	(r) (11)
		✓			Precautions taken for handling ignitable, reactive or incompatible waste or material.	(r) (12),

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

Date of inspection 2-3-82

Identification number PAD000737031

Company, Installation name TOWNSEND TEXTON

County BEAVER

Municipality FALLSTON

This facility attempted to alter status from generator-TSD to "generator only" status in October, 1982. Form ER-SWM-53 will be completed and filed with the Department's Central Office, the EPA, and the Beaver Falls Office.

If this change in status is not pursued and is not attained, this facility would be in noncompliance for written operating record, a PPC plan, and personnel training.

A containment area should be constructed around the waste oil tank per 75.262 (g), and 75.265 (r). This structure should be inspected at least weekly and those inspection results documented. The tank itself should also be inspected at least weekly with those results noted.

The construction of the containment structure should follow the schedule outlined in the forth coming "Notice Of Violation".

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person interviewed (signature) [Signature]

Date 2/8/83

Inspector (signature) Michael D. Watson

Date 2-8-83

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

BUREAU OF WASTE MANAGEMENT
Municipal Building, 2nd Floor
Eighth & 15th Streets
Beaver Falls, PA 15010

November 17, 1987

Dave Pasquale
Col-fin, Inc.
Front Street
Fallston, PA 15066

RE: Hazardous Waste Inspection
Col-fin, Inc.
Fallston
Beaver County
EPA I.D. #PAD000737031

Dear Mr. Pasquale:

On October 27, 1987, a hazardous waste inspection was conducted of your facility pursuant to the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. Section 6018.101 et seq., and the Rules and Regulations promulgated thereunder. The requirements of this Act are being enforced by the Pennsylvania Department of Environmental Resources which has received final authorization over hazardous waste activities by the U. S. Environmental Protection Agency.

Your company has filed as a generator of hazardous waste. The inspection revealed the following violations of the regulations adopted pursuant to Act 97 and Chapter 75 Rules and Regulations for Solid Waste Management, 25 Pa. Code Sections 75.262 and 75.265:

1. Section 75.262(f)(1) - Before transporting or offering a shipment of hazardous waste for transportation off-site, a generator shall permanently mark each container of 110 gallons or less according to U. S. Department of Transportation requirements under 49 CFR Section 172.304 with a Pennsylvania hazardous waste label.
2. Section 75.262(f)(2) - Before transporting hazardous waste or offering hazardous waste for transportation off-site, a generator shall placard or offer the initial transporter the appropriate placards according to the United States Department of Transportation requirements under 49 CFR Part 172, Subpart F.
3. Section 75.262(g)(1)(ii) and (iii) - A generator may accumulate hazardous waste on-site without a permit for ninety (90) days or less, provided that the waste is placed in containers which meet all U. S. Department of Transportation packaging, marking, and labeling requirements in Subsection (f), and all containers are managed in accordance with Section 75.265(q)(1-9) relating to use and management of containers.

4. Section 75.262(g)(1)(iv) - On each container, each date on which any hazardous waste was placed in that container shall be clearly marked and visible for inspection.
5. Section 75.265(q)(3) - A container holding hazardous waste shall be kept closed during storage, except when it is necessary to add or remove waste.
6. Section 75.265(q)(5) - The owner or operator shall inspect areas where containers are stored, at least weekly, for leaks and deterioration caused by corrosion or other factors.
7. Section 75.262(i)(1) - A generator who ships hazardous waste off-site shall submit quarterly reports.
8. Section 262(n)(5) - All generators of hazardous waste shall be responsible for developing and implementing a contingency plan approved by the Department for effective action to minimize and abate discharges or spills of hazardous waste from an incident resulting from the generator's activities on or adjacent to generators property. Such contingency plan shall require compliance with Section 75.264 (relating to new and existing hazardous waste facilities applying for permit), and Section 75.265 (relating to interim status or hazardous waste management facilities and permit program for new and existing hazardous waste management facilities), be developed in accordance with the Department guidelines for contingency plans, and be submitted to the Department for approval as the Department prescribes.
9. Act 97, Section 403(b)(2) - All containers used for the storage, transportation, or disposal of hazardous waste should be labeled so as to identify accurately such waste.
10. Section 75.265(r)(6) - For liquid storage and above-ground tanks or partially above-ground tanks, there shall be a containment structure with a capacity that equals or exceeds the largest above-ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operation.
11. Section 75.265(r)(8) - The owner or operator of a tank shall inspect where present:
 - 1) the level of waste in the tank, at least once each operating day,
 - 2) the construction materials of the tank, at least weekly, to detect corrosion or leaking of fixtures or seams, and
 - 3) the construction materials of, and the area immediately surrounding, discharge confinement structures at least weekly to detect corrosion or obvious signs of leakage.

To abate these violations, you should:

1. Begin to label all drums before shipment with the Pennsylvania label immediately upon receipt of this Notice;
2. Have placards available to be offered to transporters within fifteen (15) days of receipt of this Notice;
3. Mark all accumulation drums with a date when waste was first put in the drum and keep drums closed unless adding waste immediately upon receipt of this Notice;
4. Develop a written weekly inspection schedule of the drum area within fifteen days of receipt of this Notice;
5. Submit quarterly reports for all quarters beginning January, 1981 to present within thirty (30) days of receipt of this Notice;
6. Prepare a Preparedness, Prevention and Contingency Plan according to the enclosed guidelines and submit it to the Department for review (attention: Mr. John Pastelock) within sixty (60) days of receipt of this Notice;
7. Label the waste acid tank to accurately identify contents immediately upon receipt of this Notice;
8. Construct an adequate containment structure around the waste acid tank as described in Section 75.265(r) within ninety (90) days of receipt of this Notice;
9. Begin to inspect the tank and containment structure on a weekly basis with a written documentation of inspections immediately upon receipt of this Notice.
10. Develop an employee training program with written documentation of an annual review within fifteen (15) days of receipt of this Notice.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based, nor shall this letter be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

Dave Pasquale

-4-

November 17, 1987

This letter shall also not be construed as a final action of the Department of Environmental Resources.


Sincerely,

MR/KW

Mark Russell
Solid Waste Specialist
Bureau of Waste Management

MR/ld

Enclosure: PPC Guidelines

cc: Regional 
Chron
Beaver County
Kathy Watson
John Haluszczak

2500-FM-LRWM0276 Rev. 5/99



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date

5/24/05

Time Start

9:30 AM

Time Finish

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name Col-Fin Specialty Steel I.D. Number PAD000737031Site Address 100 Front St.County BeaverMunicipality FallstonZip 15066Name of Inspector D. SantiloName & Title of Responsible Official Dave Pasquale Pres/OwnerPerson Interviewed Cindy ForseTelephone (724) 843-7315Mailing Address (if different from above) PO Box 562, Fallston, PA 15066Amount of Hazardous Waste Generated per Month: 72200 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☒ Neutralization/WWTP ☒ Reclaim acid tower Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name PennOhio Corp License Number PA-AH 0618Transporter Name Vickery Transp. License Number PA-AH 0698Transporter Name Sztesy Kleen License Number PA-AH 0072

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001, D002, D005	Potassium Permanganate; sodium hydroxide	EQ Detroit MD980091566
D002, K062	Sulfuric Acid	Vickery Environmental OH D02 0273819
D039, D040, D018	Part-Washer Solvent	WV
D002	Lime Sludge	Enviro of OH
D006	Cadmium	Chemtron, OH

Reg Prod For EPA

2500-FM-LRWM0276a Rev. 5/99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT

GENERATORS -- SMALL QUANTITY GENERATORS

Site Name

Col-Fin

ID Number

Date

5/24/05

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
1				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
1				Identification Number	262a.10	262.12	H002
1				Authorized transporters only	262a.10	262.12(c)	H003
				Subsequent notification requirements met	262a.12(b)		H004
1				Proper manifest used	262a.10	262.21	H005
				Manifests filled out correctly and completely <i>See comments</i>	262a.20		H006
				Manifests signed and routed properly	262a.23(a)	262.23	H007
				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
2				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
2				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
				Personnel training program per 265.16 complied with <i>See comments</i>	262a.10	262.34(a)(4) 262.34(d)	H012
1				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
1				Specified records retained for three years	262a.10	262.40(c)	H014
1				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
	2			Exception reporting procedures followed	262a.42	262.42	H016
1				Spill reporting procedures followed	262a.10	262.34(d)	H017
1				PPC plan developed and implemented	262a.10	262.34(a)	H018
	2			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
1				Source reduction strategy prepared and available (LQG only) <i>See comments</i>	262a.100		H020
	2			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

2500-FM-LRWM0276b Rev. 5/93

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Col-Kin ID Number PA2000731031 Date 5/24/05

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
			④	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
/				Containers of hazardous waste in good condition	265a.1	265.171	H026
/				Containers and stored waste compatible	265a.1	265.172	H027
/				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
/				Containers managed to prevent leaks	265a.1	265.173(b)	H029
/				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
/				Container storage areas inspected at least weekly	265a.1	265.174	H031
/				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
/				Proper containment and collection systems in place	265a.179		H033
/				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
/				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
			④	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
			④	Containers labeled accurately identify contents <i>wheelabrator dust</i>	SWMA 6018.403(b) (2)		H037

2540-FM-LRWM0406 Rev. 7/2001

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 5/24/05 Identification Number PAD000 737031Company/Facility/Site Name Col-Fin Specialty Steel

Onsite to conduct a routine inspection. Representing Col-Fin was Cindy Forse; representing the Dept was me.

Col-Fin is cold draw specialty steel manufacturing company that operates a pickle line using hydrochloric and sulfuric acids and caustic baths (potassium permanganate and sodium hydroxide). Hazardous wastes are generated off the pickle line, from surface preparation of stainless products (Cadmium-0006) collected in the wheelabrator bag-house. Hazardous wastes are also generated from parts washer solvent.

The sulfuric acid bath is recycled in an acid recovery tower. The recycling operation also generates ferrous sulfate crystals.

Residual wastes include WWTP sludges, drawing oil, waste water and various other sludges.

The following records were reviewed: HW manifests, PPC Plan, Source Reduction strategy, inspection records, RW shipping/disposal records.

Manifests must be filled out completely and accurately: MI9085946 dtd 8/4/04 had no transporter ID# for Penn/Ohio. PAH162351 dtd 11/1/04 did not have a waste ID#.

Additionally, it was noted that Safety Kleen Premium Gold Solvent (high flash) was carrying HW Codes D018, D039, D040. It may be reasonable to carry the D039/D040 code for solvent coming from the maintenance shop.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses of Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed sent to C. Forse 5/31/05

Date _____

Inspector

D. Senti
(Signature)Date 5/31/05Page 7 of 8

Printed on Recycled Paper

TOTAL P.009

Department of Environmental Protection	GENERAL INSPECTION REPORT	Bureau of Land Recycling and Waste Management
-------------------------------------------	------------------------------	--------------------------------------------------

Type of Inspection <i>Follow-up</i>	WM Identification Number PAD 000 137 031	Entry Time/Date 7/27/05	Exit Time/Date
Facility/Incident Name and Location <i>Col-Fin Specialty Steel</i>			Municipality <i>Fallston</i>
<i>100 Front St. Fallston PA 15066</i>			County <i>Beaver</i>
Name, Address or Responsible Official <i>Dave Pasquale</i>		Title <i>Pres/Owner</i>	
<i>PO Box 562,</i>		Telephone <i>724-843-7315</i>	Interviewed <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<i>Fallston PA 15066</i>			

REMARKS Onsite to conduct a follow-up inspection to the 5/24/05 inspection. Cindy Forse represented Col-Fin; I represented the Dept.

The following previously noted violations have been remediated:

- ① Manifest have been corrected for June and July.
- ② Wheelabrator dust collection containers have been labelled and are kept closed.
- ③ The RW roll-off did not have waste outside and was appropriately labelled. The ground around the box was cleaned up.
- ④ C. Forse continues to investigate the conduct determination of the ferrous sulfate crystals. =END=

VIOLATIONS

Sample Collected <input type="checkbox"/> Yes <input type="checkbox"/> No	Sample Numbers	Analyses	
Inspector Name <i>N. S. Smith</i>	Inspector Signature <i>[Signature]</i>	Headquarters <i>Beaver Falls</i>	Date <i>8/4/05</i>
Person Interviewed Name	Signature of Person Interviewed <i>sent to C. Forse 8/4/05</i>	Title	Telephone <i>724-847-5378</i>
			Date
			Telephone

This document is official notification that a representative of the Department of Environmental Protection inspected the above mentioned facility. The findings of the inspection are shown above and on any attached pages. Violations discovered as a result of this inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses, review of pertinent documents and further investigation. Notification will be forthcoming if such violations are discovered.



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
Room 206, Municipal Building
Eighth Avenue & 15th Street
Beaver Falls, Pennsylvania 15010
August 17, 1994

(412) 846-2050

Beaver Falls District Office

847-5270

CERTIFIED MAIL # P 347 189 524

Col-Fin Specialty Steel Corporation
P.O. Box 562
Fallston, Pennsylvania 15066

RE: Notice of Violation
Sewage PA0000825
Col-Fin Specialty Steel Corporation
Fallston Borough
Beaver County

Gentlemen:

The Department of Environmental Resources conducted a boat survey of the Col-Fin Specialty Steel Corporation on July 1, 1994. The results of this inspection, along with a review of Departmental records, revealed that you were in violation of the Clean Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S. §691.1 et seq., ("Clean Streams Law") and thus subject to the penalties provided therein. The violations are listed below:

Contrary to Section 202 of the Clean Streams Law and 25 PA Code §92.3 promulgated thereunder, you were discharging sewage without an NPDES permit.

You are hereby notified to respond to this office, in writing, within ten (10) days of receipt of this letter regarding your compliance efforts. For each violation listed in this letter, your response should include information concerning:

- A. The corrective action(s) you have taken or plan to take.
- B. The date the corrective action(s) were completed or are expected to be completed.
- C. The steps you have take or plan to take to prevent a recurrence of the violation.

For information regarding permit applications, permit renewals, permit amendments, or permitting requirements, please contact Lisa Spano at the Department's Regional Office at (412) 442-4000.

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11

Col-Pin Specialty Steel

2

August 17, 1994

If you have any questions concerning this matter, please contact me at (412) 846-2050.

Sincerely,

Shawn P. Bell

Shawn P. Bell
Water Quality Specialist

bc: r t
Operations Section
J. Lytle
B. Falls

Appendix C

10

11

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

Generator I.D. # PAD000737031 Telephone # (412) 843-7315
 Site Name Lab-Fin Specialty Steel Operator Name _____
 Site Address Front St. Address P.O. Box 562
Fallston, Pa 15066
 Municipality Fallston County Beaver
 Responsible Official Dave Pasquale Title President/Owner
 Person Interviewed Steve Brown Title Plant Engineer
 Inspector Frank Calderon Time 0915

Inspection Date 10/6/26/95 Inspection Type 01 Inspector I.D. # _____ # Violation _____

INSPECTION TYPE

- | | | |
|--------------------|------------------|---------------|
| 01 Routine | 04 Follow Up | 07 Complaint |
| 02 Spill Response | 05 Sampling Only | 08 Record Rev |
| 03 Remedial Action | 06 Ground Water | 09 Other |

Comment _____

Waste Description: Large water from Pickling line Waste Code: 420
 Treatment ☒ Yes ☐ No Type WWTP - on-site
 Type of Storage: _____ Containers _____ Tanks _____ Piles _____ Impoundments
 Disposition: Destination Facility ON SITE WWTP
 Location _____ Type N/PDES
 Amount Generated: 102142 lbs/yr lb/mo _____

Waste Description: Grinding sludge Waste Code: 204
 Treatment ☐ Yes ☒ No Type _____
 Type of Storage: X Containers _____ Tanks _____ Piles _____ Impoundments
 Disposition: Destination Facility Waste Mgt. or PGH
 Location _____ Type Landfill
 Amount Generated: 26 lbs/yr lb/mo _____

Waste Description: Waste drawing oil & misc. oils Waste Code: 509
 Treatment ☐ Yes ☐ No Type _____
 Type of Storage: X Containers _____ Tanks _____ Piles _____ Impoundments
 Disposition: Destination Facility Safety Klean
 Location Smithfield, Ky Type incineration
 Amount Generated: 7 lbs/yr lb/mo _____

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

6/26/95

Generator Name Col-Fin Specialty Steel Generator I.D. # PA0000737031

Waste Description: Filtercake from WWTP Waste Code: 207

Treatment ☐ Yes ☒ No Type _____

Type of Storage: ☒ Containers _____ Tanks _____ Piles _____ Impoundments

Disposition: Destination Facility BEI Carbon Limestone L.F.

Location Lowellville, OH Type L.F.

Amount Generated: 163 tons/yr lb/mo.

Waste Description: Safety Klean Solvent Waste Code: 315

Treatment ☐ Yes ☒ No Type _____

Type of Storage: ☒ Containers _____ Tanks _____ Piles _____ Impoundments

Disposition: Destination Facility Safety Klean

Location Wheeling, WV Type recycle/reuse

Amount Generated: 1 ton/yr lb/mo.

Waste Description: Coolant Oil (H₂O sol) Waste Code: 509

Treatment ☐ Yes ☒ No Type _____

Type of Storage: ☒ Containers _____ Tanks _____ Piles _____ Impoundments

Disposition: Destination Facility Chemtron Corp

Location Avon, OH Type treatment

Amount Generated: 4 tons/yr lb/mo.

Waste Description: _____ Waste Code: _____

Treatment ☐ Yes ☐ No Type _____

Type of Storage: _____ Containers _____ Tanks _____ Piles _____ Impoundments

Disposition: Destination Facility _____

Location _____ Type _____

Amount Generated: _____ lb/mo.

Waste Description: _____ Waste Code: _____

Treatment ☐ Yes ☐ No Type _____

Type of Storage: _____ Containers _____ Tanks _____ Piles _____ Impoundments

Disposition: Destination Facility _____

Location _____ Type _____

Amount Generated: _____ lb/mo.

1

2

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

Generator Name Cal-Fin Specialty Steel PAD000737031

Date 6/26/95

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

1 = No Violation Observed 2 = Not Applicable 3 = Not Determined 4 = Non-Compliance

Chapter Citation	Requirement	Status				Line Number
		1	2	3	4	
5 Pa Code	GENERAL PROVISIONS					
287.6	Designated facility: valid permit? Permit Number (PA) _____		X			3001
287.52(a)	Biennial report submitted by March 1 of each odd numbered year	X				3002
287.53	Written source reduction strategy on file and in effect.	X				3003
287.53(b)	Waste reduction strategy covers all waste streams				X	3004
287.53(c)	Reduction strategy updated every five years or when waste or manufacturing process changes.	X				3005
287.54	Waste analysis performed: copy on file.	X				3006
287.54(b, f)	Annual analysis or certification of waste submitted to Department and designated facility.	X				3007
287.55	Small quantity generator record keeping requirements.		X			3008
287.101(a)	Operation of disposal or processing facility without a permit.	X				3009
	STORAGE REQUIREMENTS					
299.111(1)	Residual waste not mixed with hazardous waste.	X				3010
299.111(2)	Waste stored as not to create a safety risk.	X				3011
299.111(3)	Residual waste not mixed with special handling waste.	X				3012
299.111(4)	Waste not blown or otherwise deposited outside storage area.	X				3013
299.112(c)	Storage area inspected; records available.	X				3014
299.113(a)	All waste stored less than one year.	X				3015
299.114(a)	Equipment maintained in operable condition.	X				3016
299.114(c)	Equipment cleaning frequencies maintained.	X				3017
299.115	Vectors controlled and public nuisances prevented.	X				3018
299.116(a)(b)	Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	X				3019
299.116(c)	Waste stored to prevent groundwater degradation.	X				3020
299.121	Sufficient number of properly constructed storage containers.	X				3021
299.122	Storage tank design standards.		X			3022
299.112(d)	No putrescible waste or liquid waste stored in piles		X			3023
299.131	Waste storage pile area properly designed, constructed and maintained.		X			3024
299.132	Storage pad or liner system properly designed and maintained.		X			3025
299.133	Proper design and maintenance of leachate and runoff control systems.		X			3026
299.151	Proper storage and containment of incinerator ash residue		X			3027
299.152	Proper storage and containment of friable asbestos containing waste.		X			3028
299.153	Proper storage and containment of coal ash		X			3029
299.154	Proper storage and containment of PCB containing waste material.		X			3030

* See
Waste

Appendix C

INSPECTION REPORT COMMENTS

Date of Inspection 6/26/95 Identification Number PA0000337031

Company/Facility/Site Name Col-Fin Specialty Steel

- Facility considering using one company, County Environmental, for disposal of both grinding sludge & WWTP filtercake. Currently, these wastes are handled by different companies.

- Sludge from $K_2MnO_4/NaOH$ tank resulting from cleaning and/or maintenance of tank is stored in a drum. In the past, this waste was handled as a hazardous waste, however recent analyses characterize the waste as non-hazardous. It will be land filled by County Environmental of Leeper, Pa.

* See Comments:

Reference line 3014: Records are maintained for storage areas inspections, however records should be more specific w/ reference to individual storage area locations & waste contents.

* Violations noted:

Reference line 3004: Source reduction strategies not completed for all waste streams, specifically, Contant Oil and Rinsewater from pickle line. To abate this violation you should develop source reduction strategies for the aforementioned wastes using Form 25R.

Nothing Follows

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) mailed Date _____

Inspector (signature) Frank Calo Date 6/26/95

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EVALUATION - VIOLATION - ENFORCEMENT FORM						04/95 VERSION																																															
<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> Facility Record # Contact Name </div> <div style="display: flex; justify-content: space-between;"> P.A.D. 000737031 Steve Brown </div> </div>				RESERVED FOR EPA USE																																																	
<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> Handler Name Col-Fin Specialty Steel Corp </div> <div style="display: flex; justify-content: space-between;"> Street Front St. </div> <div style="display: flex; justify-content: space-between;"> Fallston </div> </div>																																																					
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I. Indicate the facility's current universe(s): II. Indicate the new RCRIS Generator Universe (mark only one): LOG <input checked="" type="checkbox"/> CEG <input type="checkbox"/> NON-HANDLER <input type="checkbox"/> SQG <input type="checkbox"/> CLOSED <input type="checkbox"/>			III. Indicate the new transporter status (Mark here only if the facility requires a transporter status change): <div style="border: 1px solid black; padding: 5px;"> <div style="display: flex; justify-content: space-between;"> Transporter <input type="checkbox"/> Non-Transporter <input type="checkbox"/> </div> <div style="display: flex;"> <div style="flex: 1;"> <p>If the transporter box is checked, you must check at least one of the boxes below:</p> <p>Mark Mode of Transportation</p> <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Air <input type="checkbox"/> Water </div> <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Rail <input type="checkbox"/> Other </div> <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Highway </div> </div> <div style="flex: 1;"> <p>Check this box if the facility is currently listed in RCRIS as a transporter and no longer transports hazardous waste</p> </div> </div> </div>																																																		
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Comments Facility has PBR for captive WWP and On-site Reclamation - acid recovery tower.																																																					
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VIOLATIONS

Agency	Number	Area	Class	Regulation Type	Regulation Citation
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Date Determined	Priority	Branch	Person	Returned to Compliance	
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VIOLATIONS

Agency	Number	Area	Class	Regulation Type	Regulation Citation
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Date Determined	Priority	Branch	Person	Returned to Compliance	
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VIOLATIONS

Agency	Number	Area	Class	Regulation Type	Regulation Citation
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Date Determined	Priority	Branch	Person	Returned to Compliance	
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	Scheduled	Actual
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ENFORCEMENT

Date	Number	Agency	Type	Branch	Person	Attorney Initials
<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Docket Number <input type="text"/>						
Penalty Type	Penalty Amount		Multimedia Enforcement Codes			
<input type="checkbox"/>	<input type="text"/>		(Place an 'X' next to all that apply)			
<input type="checkbox"/>	<input type="text"/>		<input type="checkbox"/> AIR	<input type="checkbox"/> UST		
			<input type="checkbox"/> EPCRA	<input type="checkbox"/> UIC		
			<input type="checkbox"/> FIFRA	<input type="checkbox"/> WATER		
			<input type="checkbox"/> SPCC	<input type="checkbox"/> WETLANDS		
			<input type="checkbox"/> TSCA PCB			
NOTE: To record activities for Supplemental Environmental Projects (SEPs) or to add penalty payment information, use the Supplemental Enforcement Form.						
<input type="text"/>						

VIOLATIONS COVERED BY ABOVE ENFORCEMENT

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 6/26/95 Time start 0915 Time finish 1235
Name of Inspector Frank Calderon
Company, installation name Col-Fin Specialty Steel
Location Front St.
County Beaver Municipality Fallston
Identification number PAD000733031
Name of responsible official Dave Pasquale
Title President/owner
Mailing Address _____
Area code and telephone number _____
Name of person interviewed Steve Brown
Title Plant Engineer
Mailing address (if different from above) P.O. Box 567, Fallston, Pa 15066
Area code and telephone number 412-843-7315

1. Current waste handling method:

- a ☒ On-site ☒ treatment, ☐ storage, ☐ disposal ☒ PBR
b ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
c ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a 3.67 lbs/mo kg/mo
b _____ kg/yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>D002/D003</u>	<u>Enviro-ite Corp</u>	<u>Canton, OH disposal</u>
<u>D002/D004/D007</u>	<u>Enviro-ite Corp</u>	<u>Canton, OH disposal</u>
<u>D006/D008/D018/D027</u>	<u>Safety Kleen</u>	<u>Wheeling, WV Recycle</u>
<u>D035/D039/D040</u>		

4. Source Reduction ☐ accomplished, ☒ proposed, ☐ not proposed

Appendix C

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B

Site Name Cad-Fin Specialty Steel ID Number PA000737031 Date 6/26/95

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
	X			Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
	X			PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
	X			Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
	X			Shipping containers marked and labeled according to U.S. DOT	262.30(2)	H010
	X			Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
	X			Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter I	262.34(a)(2)	H014
	X			Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
	X			a). All containers of haz. waste in good condition	265.171	H016
	X			b). Containers compatible with hazardous waste being stored within	265.172	H017
	X			c). Containers of hazardous waste kept closed	265.173(a)	H018
	X			d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
	X			e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
	X			f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
	X			g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - 177	H022
	X			h). Proper containment and collection system(s)	265.178	H023
	X			Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

C of H Specialty Steel

PAD 000737031

1-No Violation Observed

2-Not-Applicable

3-Not-Determined

4-Non-Compliance

6/24/15

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
	X			Exception reporting procedures followed	262.42	H028
	X			Hazardous waste disposal plan, if required	262.45	H029
	X			Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	X			Special requirements followed for international shipments	262.50, 53, 55, 60	H032
X				Source reduction strategy prepared and available	262.80	H033

Appendix C

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Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

6/26/95

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation
1	2	3	4			40 CFR Part 268
				Generators		
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
				Dilution not used as a substitute for treatment.		3
				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
				Storage Facilities		
				Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
				Containers marked to identify contents and accumulation date.		50(a)(2)
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				Treatment Facilities, including PBR and RRR Facilities		
				Dilution not used as a substitute for treatment.		3
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				Land Disposal Facilities		
				Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
				Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
				Facility retains copies of generator notifications and certifications.		7(c)(1)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - CHEMICAL, PHYSICAL & BIOLOGICAL TREATMENT

Site Name Alcoa Specialty Steel ID Number PAD000737031 Date 6/26/95

WWTP PBR

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBER
1	2	3	4			
X				Precautions taken for treating ignitable, reactive or incompatible waste or material	265.401(a)	H476
X				Treatment process or equipment managed to prevent leaks, rupture, corrosion or otherwise failing	265.401(b)	H477
X				Continuously fed treatment process or equipment equipped with a means to stop the inflow	265.401(c)	H478
X				Waste analysis and/or trial tests conducted on hazardous wastes substantially different than previously treated in that process or equipment or when hazardous waste is treated with a substantially different process than previously used	265.402	H479
X				Discharge control and safety equipment inspected once each operating day	265.403(1)	H480
X				Monitoring equipment data inspected once each operating day	265.403(2)	H481
X				Construction materials of treatment process or equipment inspected weekly	265.403(3)	H482
X				Construction materials or discharge confinement structure and area immediately surrounding, inspected weekly	265.403(4)	H483
	X			Closure requirements are complied with	265.404	H484
	X			Precautions taken for handling reactive, ignitable or incompatible wastes or materials	265.405 265.406	H485

Appendix C

INSPECTION REPORT COMMENTS

Date of Inspection 6/26/95 Identification Number PBB000757031

Company/Facility/Site Name Cul-Fin Specialty Steel

- Facility has switched all but one of their parts cleaners to non-hazardous solvents.

Maintenance shop has the only parts cleaner using hazardous solvent.

- Facility has notified its hazardous waste PBR activities for its captive Waste Water Treatment Plant (WWTP) and its KSF acid regeneration tower.

Note: - Facility should immediately submit forms 55A and 55C (Annual Reports) for these PBR activities, as this was not done for 1994 reporting year.

- Facility should update PPC plan to include brief descriptions of these PBR activities.

- For the acid regeneration tower, facility conducts inspections of process equipment, but keeps no written records. You should implement a written inspection program for this area as per 25 Pa. Code § 366.90.

- Reference lines H480, H482 & H483 of the inspection report, written inspection records should also be maintained for these areas of the WWTP. This is not currently done.

- Lines H014-H024 of the inspection report are marked 'Not Applicable' because facility has no hazardous waste containers or tank storage. Spent pickle liquor is pumped directly from pickle tanks into tanker trucks; spent KMnO₄ is pumped directly from process tank into tanker truck.

- Reference line H033 of inspection report, facility should develop a written Source Reduction Strategy for spent HCl pickle liquor. All other hazardous waste streams have SAS's.

** Facility generates ferrous sulfate crystals through use of the acid regeneration tower. These crystals are sold to several companies for use as water flocculants and in Waste Land Fill operations/stabilization. Facility sells this material as a product and should therefore provide the Dept. with a written Co-product Determination. This letter should be completed and submitted within 45 days. (continued) →

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____

Inspector (signature) _____ Date _____

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INSPECTION REPORT COMMENTS

Date of Inspection 6/26/95 Identification Number PAD610737031

Company/Facility/Site Name Col-Fin Specialty Steel Corp

Receipt of this report to: Dept. of Environmental Resources - SW Regional Office

Water Management - Attn: Gail Campbell

400 Waterfront Dr.

Pittsburgh, Pa 15222-4745

Nothing Follows

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) mailed Date _____

Inspector (signature) Emily Caldwell Date 6/26/95

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